

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings, which includes Figure 1, replaces the original sheet including Figure 1.

Attachment: Replacement Sheet (Figure 1)

REMARKS

Claims 1, 3-48 are pending in this application. Claim 2 is cancelled. Claims 1 and 32 are independent claims. Reconsideration and allowance of the present application are respectfully requested.

Applicants note with appreciation the Examiner's indication that the certified copies of the priority documents have been received in the U.S.P.T.O. and that the references cited in the Information Disclosure Statement filed January 5, 2005 have been considered.

Drawings

Replacement drawings have been submitted in response to the Examiner's objection in order to comply with CFR 1.121(d). Applicants respectfully request the Examiner withdraw the objection.

Specification

The abstract of the disclosure is objected because of minor informalities. Applicants have amended the abstract as suggested by the Examiner.

The disclosure is objected to because it fails to provide reference to related applications. Applicants have included a new section "CROSS REFERENCE TO RELATED APPLICATIONS" and have provided information about the Korean application No. 10-2002-0068871 therein.

Therefore, Applicants respectfully request that the Examiner withdraw the objections to the disclosure.

Claim Objections

Claims 17 and 32 are objected to because of informalities. Applicants have amended the claims in an attempt to overcome the Examiner's objection. Applicants respectfully request that the objections to claims 17 and 32 be withdrawn.

Rejections Under 35 U.S.C. §101

Claims 1 and 32 stand rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. This rejection is respectfully traversed.

Applicants have amended claim 1 to recite, "an address generating block for **converting supplied image data of raster scan order to block scan order** by generating a common read/write address...and an encoder receiving image data of the block scan order from the line memory and **encoding the received image data**." Claim 32 now recites, "**converting stored image data of raster scan order to the block scan order**; and transmitting image data of the block scan order to an encoder, **the encoder encoding the received image data**." (Emphasis Added)

As such, the conversion of supplied image data of raster scan order to block scan order and the encoding the received image data by the encoder produces "a useful, concrete and tangible result" and the claims are therefore directed to statutory subject matter.

Therefore, Applicants respectfully request that the rejections of claims 1 and 32 under 35 U.S.C. §101 be withdrawn.

Rejections Under 35 U.S.C. §112

Claims 20 and 21 stand rejected under 35 USC § 112, second paragraph, as being indefinite. This rejection is respectfully traversed.

Applicants respectfully that the term “substantially” would apprise one of ordinary skill that the recited limit value of the parameter so modified is not an absolute limit, but literally covers some additional range above or below the stated value. The Applicants respectfully contend that the present use of “substantially” simply reflects and is intended to capture the variation in anchor address and/or block address during the generation of the common read/write address and is not, therefore, vague or indefinite.

Applicants respectfully request that the rejections of claims 20 and 21 under 35 U.S.C. §112 be withdrawn.

Rejections Under 35 U.S.C. §102 - Rengakuji

Claims 1-18, 32-35 and 48 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,212,300 (“Rengakuji”). This rejection is respectfully traversed.

Claim 1 recites, *inter alia*, “an address generating block for converting supplied image data of raster scan order to block scan order by generating **a common read/write address** for the line memory so that only one line memory is required for read and write operations” (Emphasis Added)

Rengakuji is directed to an image processing apparatus for converting the format of data for specific image data. Rengakuji discloses it is preferred to provide two pairs of writing address generators and reading address generators.¹ FIG. 5 illustrates a block diagram structure of the

¹ Rengakuji, Column 5, Lines 2-4

image compression apparatus. In FIG. 5, writing address generator (Y) 113 generates the address for writing the Y image data and writing address generator (U/V) 114 generates the address for writing the U/V image data. Reading address generator (Y) 117 generates the address for reading the Y image data and reading address generator (U/V) 118 generates the address for reading the U/V image data.²

Applicants respectfully submit that Rengakuji requires two pairs of writing address generators and reading address generators and generates separate read and write addresses and Rengakuji fails to disclose generation of a common read/write address. As such, Rengakuji fails to disclose, teach or fairly suggest “an address generating block, converting supplied image data of raster scan order to block scan order, by generating a common read/write address for the line memory so that only one line memory is required for read and write operations,” (Emphasis Added) as recited in independent claim 1 and the somewhat similar features recited in claim 32.

Claims 3-18, 33-35 and 48 are also allowable at least by virtue of their dependency from one of independent claims 1 and 32.

The Examiner has failed to reject claims 19-21, 36 and 43 under any prior art. Applicants respectfully submit that these claims are also allowable at least by virtue of their dependency from independent claim 32. Therefore, Applicants respectfully request that this rejection under 35 U.S.C. §102 be withdrawn.

² Rengakuji, Column 5, Lines 5-11

CONCLUSION

In view of the above remarks and amendments, Applicants respectfully submit that each of the rejections has been addressed and overcome, placing the present application in condition for allowance. A notice to that effect is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to contact the undersigned.

Pursuant to 37 C.F.R. §1.17 and 1.136(a), Applicants hereby petition for a one (1) month extension of time for filing a reply to the outstanding Office Action and submit the required \$120.00 extension fee herewith.

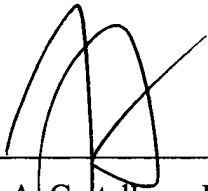
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John A. Castellano at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By



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